

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth and ERS.

**ORDER GRANTING THREE HUNDRED NINETY-SECOND OMNIBUS OBJECTION  
(NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE  
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO TO SUBSEQUENTLY AMENDED CLAIMS**

Upon the *Three Hundred Ninety-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Subsequently Amended Claims* [ECF No. 17970] (the “Three Hundred Ninety-Second Omnibus Objection”),<sup>2</sup> filed by the Commonwealth of Puerto Rico

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Finaancing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Ninety-Second Omnibus Objection.

(“Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”), dated August 25, 2021, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Three Hundred Ninety-Second Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Ninety-Second Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Ninety-Second Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Three Hundred Ninety-Second Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been amended and superseded by the subsequently filed proofs of claim identified in the column titled “Remaining Claims” in Exhibit A (collectively, the “Remaining Claims”); and the Court having determined that the relief sought in the Three Hundred Ninety-Second Omnibus Objection is in the best interests of the Commonwealth, ERS, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Ninety-Second Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Three Hundred Ninety-Second Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Ninety-Second Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors' right to object to the Remaining Claims is reserved; and it is further

ORDERED that Kroll is authorized and directed to designate as expunged the Claims to Be Disallowed on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 17970 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to Three Hundred Ninety-Second Omnibus Objection**

Three Hundred and Ninety-Second Omnibus Objection  
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT		NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	DE JESUS RIVAS, IVETTE PO BOX 9785 CIDRA, PR 00739	06/28/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	119485	Undetermined*		DE JESUS RIVAS, IVETTE PO BOX 9785 CIDRA, PR 00739	08/10/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179491	\$ 75,000.00
	Reason: Amended and superseded by a later filed Proof of Claim.										
2	DE JESUS RIVAS, IVETTE PO BOX 9785 CIDRA, PR 00739	06/25/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	90741	Undetermined*		DE JESUS RIVAS, IVETTE P.O. BOX 9785 CIDRA, PR 00739	08/10/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179489	\$ 50,000.00
	Reason: Amended and superseded by a later filed Proof of Claim.										
3	DE JESUS RIVAS, IVETTE PO BOX 9785 CIDRA, PR 00739	06/28/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	107553	Undetermined*		DE JESUS RIVAS, IVETTE P.O. BOX 9785 CIDRA, PR 00739	08/10/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179490	\$ 75,000.00
	Reason: Amended and superseded by a later filed Proof of Claim.										
4	ORIENTAL BANK PO BOX 195115 SAN JUAN, PR 00919-5115	06/29/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	132642	Undetermined*		ORIENTAL BANK PO BOX 195115 SAN JUAN, PR 00919	06/29/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	143566	\$ 28,452,216.00
	Reason: Amended and superseded by a later filed Proof of Claim.										
5	SANTIAGO QUIJANO, YEZENIA E PO BOX 705 CAMUY, PR 00627	06/29/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	162423	Undetermined*		SANTIAGO QUIJANO, YEZENIA E PO BOX 705 CAMUY, PR 00627	08/16/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179528	\$ 15,000.00
	Reason: Amended and superseded by a later filed Proof of Claim.										